

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE	:	CHAPTER 13
PABLO CELEDONIO	:	
	:	
Debtor(s)	:	No. 23-11453 amc

DEBTOR'S OBJECTION TO THE CERTIFICATION OF DEFAULT FILED BY  
PERITUS PORTFOLIO SERVICES II, LLC

COMES NOW, Pablo Celedonio, Debtor and Respondent, by and through attorney of record, Michele Perez Capilato, Esquire, and submits the following Objection to the Certification of Default filed by Peritus Portfolio Services II, LLC.

1. Debtor acknowledges that he fell behind with post-petition payments due to a delay in pay and a period of reduced work hours.
2. Debtor denies the total amount of post-petition delinquency alleged in Movant's Notice of Default. He believes there may be a payment or two that has not been properly credited.
3. Debtor is gathering payment receipts and will forward same to Counsel.
4. Debtor is prepared to cure any remaining arrears due to Movant.

Wherefore Debtor respectfully requests this honorable Court refrain from signing the Order Modifying the Automatic Stay and set a hearing date giving Debtor an opportunity to provide proof of compliance with the Stipulation, and that Debtor have judgment for reasonable costs and attorney fees incurred in connection with the defense of this matter.

January 7, 2025

Respectfully submitted,

Law Offices of Michele Perez Capilato

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